

# **EXHIBIT 3**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO, LLC; OTTO TRUCKING  
LLC

Defendants.

Case No. 3:17-cv-00939-JCS

**PLAINTIFF WAYMO LLC'S SECOND  
SET OF EXPEDITED REQUESTS FOR  
PRODUCTION PURSUANT TO  
PARAGRAPH SIX OF MAY 11, 2017  
PRELIMINARY INJUNCTION ORDER**  
Honorable William H. Alsup

**HIGHLY CONFIDENTIAL –  
ATTORNEYS' EYES ONLY**

**PLAINTIFF'S SECOND SET OF EXPEDITED REQUESTS FOR PRODUCTION  
PURSUANT TO PARAGRAPH SIX OF MAY 11, 2017 PRELIMINARY INJUNCTION  
ORDER (DKT. 433)**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the Court's order granting further expedited discovery (Dkt. 433 at 25 ¶ 6), Plaintiff Waymo LLC ("Waymo") requests that Defendants Uber Technologies, Inc. ("Uber"), Ottomotto, LLC ("Ottomotto"), and Otto Trucking LLC ("Otto Trucking") (collectively "Defendants"), produce for inspection and copying within fourteen calendar days (14) hereof the documents set forth below at the offices of

7. If DEFENDANTS' response to a particular Request is a statement that DEFENDANTS lack the ability to comply with that Request, DEFENDANTS shall specify whether the inability to comply is because the particular item or category of information never existed, has been destroyed, has been lost, misplaced or stolen, or has never been, or is no longer in DEFENDANTS' possession, custody or control, in which case DEFENDANTS shall identify the name and address of any person or entity known or believed by DEFENDANTS to have possession, custody or control of that information or category of information.

8. DEFENDANTS' obligation to respond to these Requests is continuing, and their responses are to be supplemented to include subsequently acquired information in accordance with the requirements of Rule 26(e) of the Federal Rules of Civil Procedure.

#### **DOCUMENT REQUESTS**

##### **REQUEST FOR PRODUCTION NO. 10:**

All lab notebooks belonging to LiDAR personnel or associated with LiDAR workstations.

##### **REQUEST FOR PRODUCTION NO. 11:**

DOCUMENTS sufficient to show how the placement of FAC lenses on laser diodes is performed.

##### **REQUEST FOR PRODUCTION NO. 12:**

DOCUMENTS sufficient to show the design of any assembly tools for FAC lenses.

##### **REQUEST FOR PRODUCTION NO. 13:**

All COMMUNICATIONS between Brian McClendon and LEVANDOWSKI.

##### **REQUEST FOR PRODUCTION NO. 14:**

All COMMUNICATIONS between Brian McClendon and any PERSON REGARDING OTTOMOTTO or OTTO TRUCKING before August 23, 2016.

##### **REQUEST FOR PRODUCTION NO. 15:**

All COMMUNICATIONS between Travis Kalanick and LEVANDOWSKI.